

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARK ANTHONY KANOFF,

Defendant.

Case: 1:19-cr-20647

Judge: Ludington, Thomas L.

MJ: Morris, Patricia T.

Filed: 09-25-2019 At 02:41 PM

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**INDICTMENT**

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**THE GRAND JURY CHARGES:**

**COUNT ONE**

**Production of Child Pornography  
(18 U.S.C. § 2251(a))**

In or about the month of July, 2019, in the Eastern District of Michigan, Northern Division, Mark Anthony Kanoff knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2) for the purpose of producing a visual depiction of such conduct including, but not limited to, images depicting a prepubescent minor female masturbating and exposing her genitalia, that was produced and transmitted using materials that had been transported in and

affecting interstate and foreign commerce by any means, including by computer in violation of Title 18, United States Code, Section 2251(a).

**Forfeiture Allegation**

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture.

Pursuant to Fed. R. Crim. P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 2253, in the event of the defendant's conviction under Count One of this Indictment.

Pursuant to Title 18, United States Code, Section 2253, upon a conviction of the offense set forth in Count One of this Indictment, in violation of Title 18, United States Code, Section 2251(a), defendant Mark Anthony Kanoff, shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, sections 2251, 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;

- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses; and

Dated: September 25, 2019

THIS IS A TRUE BILL

MATTHEW SCHNEIDER  
United States Attorney

s/Grand Jury Foreperson  
GRAND JURY FOREPERSON

s/Timothy Turkelson  
TIMOTHY TURKELSON (P53748)  
Assistant U.S. Attorney  
101 First Street, Suite 200  
Bay City, Michigan 48708-5747  
(989) 895-5712  
timothy.turkelson@usdoj.gov

s/Anthony P. Vance  
ANTHONY P. VANCE (P61148)  
Assistant U.S. Attorney  
Chief, Branch Offices

**Companion Case information MUST be completed by AUSA and initialed**

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	<b>Case Number</b>
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>		Case: 1:19-cr-20647
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :		Judge: Ludington, Thomas L.
<input type="checkbox"/> Yes	<input type="checkbox"/> No	MJ: Morris, Patricia T.
		Filed: 09-25-2019 At 02:41 PM
		SEALED MATTER (krc)

**Case Title:** USA v. Mark Anthony Kanoff**County where offense occurred:** Alcona**Check One:** ☒ **Felony**    ☐ **Misdemeanor**    ☐ **Petty**

☒ Indictment/\_\_\_\_\_ Information --- **no** prior complaint.  
☐ Indictment/\_\_\_\_\_ Information --- based upon prior complaint [Case number:]  
☐ Indictment/\_\_\_\_\_ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

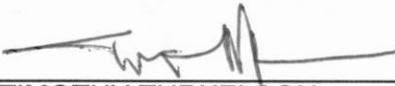
**Superseding Case Information****Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

Date: September 23, 2019

  
TIMOTHY TURKELSON  
Assistant United States Attorney  
101 First Street, Suite 200, Bay City, MI 48708  
Phone: 989-895-5712  
Fax: 989-895-5790  
E-Mail address: timothy.turkelson@usdoj.gov  
Attorney Bar #: P-53748

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.